

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-_____
v.	:	DATE FILED: _____
EMMANUEL AJAYI	:	VIOLATIONS:
	:	18 U.S.C. § 1542
	:	(false statement on passport application
	:	- 1 count)
	:	18 U.S.C. § 911
		(false claim of citizenship - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 22, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

EMMANUEL AJAYI,

an alien and native and citizen of Nigeria, knowingly and willfully made false statements in an application for a United States passport with intent to induce and secure for his own use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant AJAYI stated that he was born in North Carolina, and was, therefore, a United States citizen, which statement he knew to be false.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

EMMANUEL AJAYI

an alien and a citizen and native of Nigeria, falsely and willfully represented himself to be a
citizen of the United States.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney_____